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Northglenn Retail, LLC, TI PI Texas, LLC,
Dudley Mitchell Properties TX, LLC,
Shelby Properties TX, LLC and Pintar
Investment Properties TX, LLC**

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE:	§	
	§	
CIRCUIT CITY STORES, INC., et al,	§	CASE NO. 08-35653-KRH
	§	Jointly Administered
	§	
DEBTORS.	§	CHAPTER 11

**STIPULATION BETWEEN (I) THE CIRCUIT CITY STORES, INC. LIQUIDATING
TRUST AND (II) CHINO SOUTH RETAIL PG, LLC, NORTHGLENN RETAIL, LLC,
TI PI TEXAS, LLC, DUDLEY MITCHELL PROPERTIES TX, LLC, SHELBY
PROPERTIES TX, LLC AND PINTAR INVESTMENT PROPERTIES TX, LLC
(Relates to Claim Nos. 8990, 15279, 8932, 15278, 8978 and 15277)**

On November 10, 2008 (the “Petition Date”), the above-captioned debtors (the “Debtors”) each filed a voluntary petition for relief under Chapter 11 of the United States Code in the United States Bankruptcy Court for the Eastern District of Virginia (the “Court”).

On January 30, 2009, Chino South Retail PG, LLC (“Chino South”) filed an unsecured claim against Circuit City Stores West Coast, Inc. [Claim No. 8990], and on or about July 2, 2012, Chino South filed an amended claim [Claim No. 15279] (collectively, the “Chino South Claim”).

On January 30, 2009, TI PI Texas LLC, Dudley Mitchell Properties TX, LLC, Shelby Properties TX LLC and Pintar Investment Properties TX, LLC (collectively, “Denton”) filed an unsecured claim against Circuit City Stores, Inc. [Claim No. 8932], and on or about July 2, 2012, Denton filed an amended claim [Claim No. 15278] (collectively, the “Denton Claim”).

On January 30, 2009, Northglenn Retail, LLC (“Northglenn”) filed an unsecured claim against Circuit City West Coast, Inc. [Claim No. 8978], and on or about July 2, 2012, Northglenn filed an amended claim [Claim No. 15277] (collectively, the “Northglenn Claim”).

On February 25, 2011, the Circuit City Stores, Inc. Liquidating Trust (the “Liquidating Trust”), through Alfred H. Siegel, the alleged trustee of the Trust (the “Trustee”), filed an objection to the Chino South Claim [Dkt. No. 10047] (the “First Chino South Claim Objection”).

On April 6, 2011, Chino South filed its response to the First Chino South Claim Objection. (*See* Dkt. No. 10329).

On or about April 20, 2012, the Liquidating Trust filed another objection to the Chino South Claim [Dkt. No. 11851] (the “Second Chino South Claim Objection”, and together with the First Chino South Claim Objection, the “Chino South Claim Objections”). On or about April 20, 2012, the Liquidating Trust also filed an objection to the Denton Claim [Dkt. No. 11853] (the

“Denton Claim Objection”) and an objection to the Northglenn Claim [Dkt. No. 11852] (the “Northglenn Claim Objection”). The Liquidating Trust has agreed that the deadline for Chino South, Denton and Northglenn (collectively, the “Landlord Creditors”) to respond to the foregoing objections is currently October 2, 2012.

On August 15, 2012, the Liquidating Trust filed a Motion For Order Automatically Expunging Claims and Related Relief [Dkt. No. 12334] (the “Motion to Expunge”).

In an effort to avoid the cost of litigation between the Landlord Creditors and the Liquidating Trust (collectively, the “Parties”), the Parties do hereby STIPULATE AND AGREE as follows:

The Motion to Expunge and any order entered, or to be entered, regarding the Motion to Expunge shall not apply to the Chino South Claim, Denton Claim or Northglenn Claim. Such claims shall not be stricken or expunged from the records of the Court or Kurtzman Carson Consultants based on the Motion to Expunge or any order entered on that motion, and the Liquidating Trust shall give Kurtzman Carson Consultants LLC written instruction to that effect.

The Chino South Objections shall be deemed filed against the Chino South Claim (which includes Claim No. 15279).

The Denton Claim Objection shall be deemed filed against the Denton Claim (which includes Claim No. 15278).

The Northglenn Claim Objection shall be deemed filed against the Northglenn Claim (which includes Claim No. 15277).

If Chino South, Northglenn and/or Denton is required to provide additional documentation in support of the Chino South Claim, Northglenn Claim or Denton Claim, respectively, then such claimant(s) may provide such additional documentation or information

(the “Additional Information”) without the need to further amend its claim. The Liquidating Trust reserves its right to assert that Chino South, Northglenn and/or Denton did not timely amend their claims (except not based on the Motion to Expunge or any Order entered on the Motion to Expunge), and that any Additional Information is untimely, and the Landlord Creditors reserve their right to oppose, and assert any defenses or objections with respect to, any such assertion by the Liquidating Trust.

Dated: August 31, 2012

ACCEPTED AND AGREED TO BY:

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